

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RAJAN PATEL)	
)	
Plaintiffs,)	Civil Action No. 2:21-cv-00546
)	
v.)	
)	Hon. Nitza I. Quiñones-Alejandro
ECFMG,)	
)	
Defendant.)	

DEFENDANT’S MOTION TO DISMISS PLAINTIFF’S COMPLAINT

For the reasons set forth in the attached memorandum of law, Defendant ECFMG, by and through its undersigned counsel, moves to dismiss Plaintiff’s Complaint against ECFMG pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6).

DATED: May 25, 2021

/s/ Elisa P. McEnroe

Elisa P. McEnroe, PA Bar No. 206143
Max O. Bernstein, PA Bar No. 325405
MORGAN, LEWIS & BOCKIUS, LLP
1701 Market Street
Philadelphia, PA 19103-2921
Telephone: +1.215.963.5917
Facsimile: +1.215.963.5001
elisa.mcenroe@morganlewis.com
max.bernstein@morganlewis.com

Attorneys for Defendant ECFMG

CERTIFICATE OF SERVICE

I do hereby certify that on this date, I caused true and correct copies of the foregoing document to be served via electronic filing upon the following via the ECF system and First Class U.S. Mail:

Rajan Patel
8701 Deanne Dr.
Gaithersburg, MD 20882

Plaintiff

DATED: May 25, 2021

/s/ Elisa P. McEnroe
Elisa P. McEnroe